

**IN THE DISTRICT COURT OF THE UNITED STATES
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

UNITED STATES OF AMERICA)	CRIMINAL NO.: 2:21-CR-341
)	
vs.)	MOTION FOR DISCLOSURE TO
)	USE EVIDENCE OF OTHER CRIMES
XAVIER WILLIAMS)	FEDERAL RULE OF EVIDENCE 404(b)
)	
Defendant.)	
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TO: JAMIE LEE NABORS SCHOEN, ASSISTANT UNITED STATES ATTORNEY

The Defendant, **XAVIER WILLIAMS**, by and through his undersigned attorney, hereby moves before the United States District Judge for the District of South Carolina, Charleston Division, pursuant to Federal Rule of Evidence, Rule 404(b), for an Order requiring the Government to disclose its intent to use any evidence of other crimes, wrongs, or acts as proof of motive, opportunity, intent, preparation, plan, knowledge, identity, absence of mistake, accident, or any other purpose. In this regard, the Government should specify the particular crime, wrong, or act to be used and the particular theory upon which it maybe admissible.

Respectfully submitted,

s/ A. Peter Shahid, Jr.
A. Peter Shahid, Jr., Esquire
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November 21, 2021
Charleston, SC

